

**Exhibit A**  
**Inmate File of Eddie L. Foreman, Jr.**  
**Booking Sheet dated May 30, 2004**

LEE COUNTY SHERIFF'S OFFICE  
INMATE BOOKING SHEET

PAGE 1

05/30/2004 17:19:48

BOOKING NO: 040002557

INMATE NAME: FOREMAN EDDIE LEWIS *JN.*

ALIAS:

ALIAS:

ADDRESS: [REDACTED]

CITY/ST/ZIP: AUBURN, AL 36803

HOME PHONE: [REDACTED]

DOB: [REDACTED] 1973 AGE: 30

PLCE BIRTH: LEE CO

STATE: AL

M. STATUS: MARRIED

RELIGION: CHRISTIAN

GANG ASSOC:

SCARS/TATTOOS: NUMEROUS TATTOOS

KNOWN ENEMIES: NONE CLAIMED

REMARKS:

## NEXT OF KIN

NEXT OF KIN: JOAN FOREMAN

RELATIONSHIP: MOTHER

ADDRESS: [REDACTED]

PHONE: [REDACTED]

CITY/ST/ZIP: OPELIKA, AL

REMARKS:

## EMPLOYER INFO

EMPLOYED: N

EMPLOYER NAME: N

ADDRESS: N

CITY/ST/ZIP: ,

PHONE: 000-000-0000

## MEDICAL

HANDICAPPED: N NEEDS: N

GLASSES: N SMOKE: Y

MEDICAL NEEDS: N NEEDS: N

PHYSICIAN: N

PHONE: 000-000-0000

REMARKS:

REMARKS:

## PROPERTY

CASH: \$240.66

DESCRIPTION:

ADD. PROPERTY: STREET CLOTHING, BILLFOLD, WATCH, SET KEYS

ADD. PROPERTY: LIGHTER, SCARF, CIGAR, PAPAER

ADD. PROPERTY:

BIN NUMBER: 101

VEH IMPOUNDED:

IMPOUND LOT:

REMARKS:

REMARKS:

I HAVE READ THE ABOVE ACCOUNTING OF MY PERSONAL INFORMATION, MEDICAL INFORMATION, MONEY, AND OTHER PROPERTY AND I FIND IT TO BE TRUE AND ACCURATE.

INMATE: *Eddie Foreman, Jr.* DATE: *5-30-04* TIME: *415-*BOOK OFFICER: *Ansy* DATE: *5-30-04* TIME: *415-*

LEE COUNTY SHERIFF'S OFFICE  
INMATE BOOKING SHEET

05/30/2004 17:19:48

PAGE 2

BOOKING NO: 040002557

INMATE NAME: FOREMAN EDDIE LEWIS

COURT: CIRCUIT

ATTORNEY ON REC:

JUDGE:

PHONE: 000-000-0000

REMARKS:

REMARKS:

BOOK DATE: 05/30/2004 BOOK TIME: 17:03 BOOK TYPE: NORMAL

ARREST DATE: 05/30/2004

BOOKING OFFICER: AUSBY

ARREST DEPT: OPD

CELL ASSIGNMENT: HC3

ARRST OFFICER: PRUITT

MEAL CODE: 01 LEE COUNTY

PROJ. RLSDATE: 00/00/0000

FACILITY: 01 COUNTY JAIL

SEARCH OFCR: FRAZIER

CLASSIFICATION:

TYPE SEARCH: PAT

WORK RELEASE: N

INTOX RESULTS:

HOLDS: N

AGENCY:

REASON:

AGENCY:

REASON:

AGENCY:

REASON:

AGENCY:

REASON:

NOTES:

NOTES:

NOTES:

## LEE COUNTY SHERIFF'S OFFICE

## INMATE CHARGE SHEET

PAGE 3

05/30/2004 17:19:48

BOOKING NO: 040002557 INMATE NAME: FOREMAN EDDIE LEWIS

CHARGE NO: 1 DISPOSITION: OPEN

HOLD: N

ALA STATUTE: 13A-8-43

# OF COUNTS: 1

OFFENSE: ROBBERY III

WARRANT #:

CASE #:

BOND AMT: 100,000

FINE: \$0.00

BAIL AMT: 100,000

SENTENCE DATE: 00/00/0000

INIT APPEAR: 00/00/0000

RELEASE DTE: 00/00/0000

ARST AGENCY: OPD

ARREST DATE: 05/30/2004

COUNTY: LEE

ARST OFFICR: PRUITT

JUDGE: JUDGE WALKER

COURT: CIRCUIT

DIST ATTORNEY:

DEF ATTORNY:

COMMENTS:

COMMENTS: BOND SET BY JUDGE WALKER

COMMENTS:

**Exhibit B**  
**Affidavit of Major Cary Torbert, Jr.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

EDDIE L. FOREMAN, JR., )  
                            )  
Plaintiff,               )  
                            )  
v.                         ) Civil Action No. 3:05-CV-1134-WKW  
                            )  
SHERIFF JAY JONES, et.al., )  
                            )  
Defendant.               )

**AFFIDAVIT OF CARY TORBERT, JR.**

STATE OF ALABAMA           )  
                            )  
COUNTY OF LEE               )

**BEFORE ME**, the undersigned authority and Notary Public in and for said County and State at large, personally appeared Cary Torbert, Jr., who being known to me and being by me first duly sworn on oath deposes and says as follows:

1. My name is Cary Torbert, Jr. I am over the age of nineteen and competent to execute this affidavit.

2. I serve as Chief Deputy of Corrections of the Lee County Detention Facility and have obtained the rank of Major. I have worked with the Lee County Sheriff's Department for over 32 years.

3. I am familiar with the Plaintiff, Eddie L. Foreman, Jr., due to his incarceration in the Lee County Detention Facility.

4. I state affirmatively that I neither acted, nor caused anyone to act, in such a manner as to deprive the Plaintiff of any right to which he was entitled.

5. The Plaintiff was a pretrial detainee at all times relevant to the allegations made the basis of the Plaintiff's Complaint.

6. It is the policy of the Lee County Sheriff's Department to allow persons incarcerated in the Lee County Detention Center the opportunity to worship in the recognized religion of their choice, receive religious counseling, and attend in-house religious programs.

7. Religious professionals and religious volunteers who wish to provide scheduled religious programs must be cleared by the Chief Deputy Sheriff before being admitted to the Detention Center.

8. All religious visitors are subject to search and must comply with all visitor regulations.

9. Religious volunteers who are approved may go into the dayroom and provide ministry in general population areas to those inmates who wish to participate.

10. Religious volunteers may also make use of the multi-purpose area in order to hold religious services.

11. Inmates in administrative segregation may receive ministry individually only.

12. Detention Center officials may end or limit a ministry session or limit the number of religious volunteers if necessary.

13. Religious services may be scheduled for a set time each week. Other services may be scheduled for other times with the Chief Deputy Sheriff's approval. Normally, there are religious services held on Wednesdays and Sundays. Inmates have the opportunity to request an individual religious visit for any Wednesday by filling out a request form and turning it in to any officer.

14. If any request was made by the Plaintiff for an individual religious visit, that request would have been answered, and a copy of the answered request would have been placed in the Plaintiff's inmate file. However, upon review of the Plaintiff's inmate file, no such form is

present.

15. No inmate who, in the opinion of the Sheriff, Chief Deputy Sheriff, or Shift Supervisor, presents a security risk may attend religious services. Such inmates will be allowed free access to religious counseling or conferences on an individual basis.

16. No member of the Detention Center staff may discriminate against any inmate on the basis on that inmate's choice of religion.

17. The Lee County Sheriff's Department will not provide any religious materials of any nature to inmates at Sheriff's Department's expense.

18. It is the policy of the Lee County Sheriff's Department that no person be incarcerated in a situation within the Lee County Detention Center where his life or health may be threatened by another inmate when, by making the situation known to members of the Detention Center staff, he can be incarcerated elsewhere.

19. All persons being booked into the Lee County Detention Center are given an opportunity to complete an Enemies List.

20. The Booking Officer gives the arrestee an opportunity to make known in writing any person within the Detention Center whom he fears or has reason to believe is a threat to him in any way.

21. If the inmate states that there is an inmate or inmates that would do him harm, Detention Center personnel will list the inmate or inmates on the Enemies List form stating the reason the new inmate feels that he is in danger.

22. Whenever such a situation occurs, the Shift Supervisor will be notified and the new inmate will be housed away from those who he fears will cause him harm.

23. At the time the Plaintiff was booked into the Lee County Detention Facility, the Booking Officer was required to note on the booking sheet whether or not a new inmate stated that he had knowledge of any other inmate who would cause him harm.

24. Derode Woods, the inmate of whom the Plaintiff complains, had been convicted of Felony DUI, which is not considered a violent crime.

25. The date that the Plaintiff was involved in a fight with Derode Woods was June 5, 2004. June 5, 2004, fell on a Saturday, and therefore I was not on duty that day. The knowledge that I have concerning this incident is gleaned from the reports attached to the affidavits of Sergeant Tabb and Corporal Cowhick. These reports are true and accurate copies of inmate records kept by me in the ordinary course of my business. I am the custodian of these records.

26. Prior to the altercation on June 5, 2004, the Plaintiff had never asked to be separated from Derode Woods. Had the Plaintiff requested to be separated from Derode Woods, I or any other officer would have done so in accordance with the policy of the Lee County Detention Center.

27. The inmates involved in the altercation were separated immediately after the incident and remained separated until each was either released or transferred to the Department of Corrections.

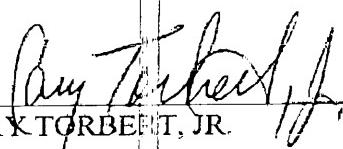
28. Internal grievance procedures at the Lee County Detention Facility are available to all inmates. It is the policy of the Lee County Sheriff's Department that inmates are permitted to submit grievances and that each grievance will be acted upon. Upon request, the inmates are given an Inmate Grievance Form to complete and return to a Lee County Detention Facility staff member for any grievances they may have. At no time, however, did the Plaintiff file any grievances concerning any of the claims made in his Complaint. Had such a grievance been

filed, it would have been acted upon accordingly (that is, whether an investigation was needed or simply a response made to the complaints). A copy of all grievances are filed in the inmate's file. However, there is no such grievance in the Plaintiff's inmate file. Further, there was no written request form was filed by the Plaintiff concerning the altercation with Derode Woods or the religion issue. Had the Plaintiff made a request concerning any of these matters there also would have been a response made to such complaints on the written request form, and a copy would have been placed in the Plaintiff's inmate file. However, no such request can be found in the Plaintiff's inmate file.

29. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.

30. All documents attached to the Special Report are true and accurate copies of jail documents kept by me in the ordinary course of my business. I am the custodian of these records.

31. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit, and that the above statements were made by drawing from my personal knowledge of the situation.

  
CARY TORBERT, JR.

SWORN TO and SUBSCRIBED before me this 27 day of January, 2006.

  
NOTARY PUBLIC  
My Commission Expires:

**Exhibit C**  
**Affidavit of Sheriff Jay Jones**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

EDDIE L. FOREMAN, JR.,

Plaintiff,

v.

SHERIFF JAY JONES, et.al.,

Defendant.

Civil Action No. 3:05-CV-1134-WKW

AFFIDAVIT OF JAY JONES

STATE OF ALABAMA

COUNTY OF LEE

BEFORE ME, the undersigned authority and Notary Public in and for said County and State at large, personally appeared Jay Jones, who being known to me and being by me first duly sworn on oath deposes and says as follows:

1. My name is Jay Jones. I am over the age of nineteen and competent to execute this affidavit.

2. I am the duly elected Sheriff of Lee County, Alabama, and have served in such capacity since 1999.

3. I am familiar with the Plaintiff, Eddie L. Foreman, Jr., due to his incarceration in the Lee County Detention Facility. I have no personal knowledge of any of the specific allegations that form the basis of Plaintiff's Complaint.

4. I state affirmatively that I neither acted, nor caused anyone to act, in such a manner as to deprive the Plaintiff of any right to which he was entitled.

5. I have delegated the responsibility for the day-to-day functions of the Lee County Detention Facility to Major Cary Torbert, Jr., the Chief Deputy of Corrections of the Lee County

Detention Facility. As Sheriff of Lee County, I am responsible for promulgating the policies governing the Lee County Detention Facility.

6. It is the policy of the Lee County Sheriff's Office to allow persons incarcerated in the Lee County Detention Center the opportunity to worship in the recognized religion of their choice, receive religious counseling, and attend in-house religious programs.

7. Religious professionals and religious volunteers who wish to provide scheduled religious programs must be cleared by the Chief Deputy Sheriff before being admitted to the Detention Center.

8. All religious visitors are subject to search and must comply with all visitor regulations.

9. Religious volunteers who are approved may go into the dayroom and provide ministry in general population areas to those inmates who wish to participate.

10. Religious volunteers may also make use of the multi-purpose area in order to hold religious services.

11. Inmates in administrative segregation may receive ministry individually only.

12. Detention Center officials may end or limit a ministry session or limit the number of religious volunteers if necessary.

13. Religious services may be scheduled for a set time each week. Other services may be scheduled for other times with the Chief Deputy Sheriff's approval.

14. No inmate who, in the opinion of the Sheriff, Chief Deputy Sheriff, or Shift Supervisor, presents a security risk may attend religious services. Such inmates will be allowed free access to religious counseling or conferences on an individual basis.

15. No member of the Detention Center staff may discriminate against any inmate on

the basis on that inmate's choice of religion. Any member of the jail staff who engaged in such discrimination would be in violation of my policies.

16. The Lee County Sheriff's Office will not provide any religious materials of any nature to inmates at Sheriff's Department's expense.

17. It is the policy of the Lee County Sheriff's Office that no person be incarcerated in a situation within the Lee County Detention Center where his life or health may be threatened by another inmate when, by making the situation known to members of the Detention Center staff, he can be incarcerated elsewhere.

18. All persons being booked into the Lee County Detention Center are given the opportunity to complete an Enemies List.

19. The Booking Officer gives the arrestee an opportunity to make known in writing any person within the Detention Center whom he fears or has reason to believe is a threat to him in any way.

20. If the inmate states that there is an inmate or inmates that would do him harm, Detention Center personnel will list the inmate or inmates on the Enemies List form stating the reason the new inmate feels that he is in danger.

21. Whenever such a situation occurs, the Shift Supervisor will be notified and the new inmate will be housed away from those who he fears will cause him harm.

22. In addition, at any time, an inmate may activate the buzzer in the cell or otherwise alert any officer and orally request to be moved to a different cell if that inmate feels that he is in danger of an attack. All Detention Center staff understand that an inmate's oral or written request to be moved where the inmate feels threatened is to be taken seriously. If such a request is made, that inmate is moved *immediately*.

23. At the time the Plaintiff was booked into the Lee County Detention Facility, the Booking Officer was required to note on the booking sheet whether or not a new inmate stated that he had knowledge of any other inmate who would cause him harm.

24. Failure to give an inmate an opportunity to complete an enemies list or having an inmate with a known enemy would violate the policies I have established for the jail.

25. Internal grievance procedures at the Lee County Detention Facility are available to all inmates. It is the policy of the Lee County Sheriff's Office that inmates are permitted to submit grievances and that each grievance will be acted upon. Upon request, the inmates are given an Inmate Grievance Form to complete and return to a Lee County Detention Facility staff member for any grievances they may have. If a grievance is filed, it is acted upon accordingly, (that is, whether an investigation was needed or simply a response made to the complaints). It would be a violation of jail policy to refuse to provide an inmate with a grievance form or ignore a filed grievance.

26. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.

27. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation.

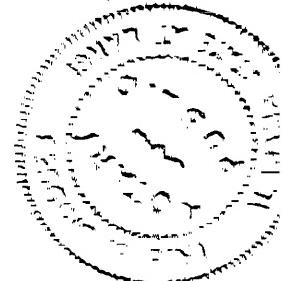
  
JAY JONES

SWORN TO and SUBSCRIBED before me this 3<sup>rd</sup> day of January, 2006.

  
Iris D. Bridges

NOTARY PUBLIC

My Commission Expires: FEB 10, 2007



**Exhibit D**  
**Affidavit of Lieutenant Ray Roberson**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

EDDIE L. FOREMAN, JR., )  
                            )  
Plaintiff,               )  
                            )  
v.                         ) Civil Action No. 3:05-CV-1134-WKW  
                            )  
SHERIFF JAY JONES, et.al., )  
                            )  
Defendant.               )

**AFFIDAVIT OF RAY ROBERSON**

STATE OF ALABAMA       )  
                            )  
COUNTY OF LEE           )

**BEFORE ME**, the undersigned authority and Notary Public in and for said County and State at large, personally appeared Ray Roberson, who being known to me and being by me first duly sworn on oath deposes and says as follows:

1.       My name is Ray Roberson. I am over the age of nineteen and competent to execute this affidavit.
2.       I am employed with the Lee County Sheriff's Department and serve as Assistant Jail Administrator at the Lee County Detention Facility. I have worked in the Lee County Detention Facility for twenty-three years and have obtained the rank of lieutenant.
3.       I am familiar with the Plaintiff, Eddie L. Foreman, Jr., due to his incarceration in the Lee County Detention Facility.
4.       I state affirmatively that I neither acted, nor caused anyone to act, in such a manner as to deprive the Plaintiff of any right to which he was entitled.
5.       It is the policy of the Lee County Sheriff's Department to allow persons incarcerated in the Lee County Detention Center the opportunity to worship in the recognized religion of their choice, receive religious counseling, and attend in-house religious programs.

6. Religious professionals and religious volunteers who wish to provide scheduled religious programs must be cleared by the Chief Deputy Sheriff before being admitted to the Detention Center.

7. All religious visitors are subject to search and must comply with all visitor regulations.

8. Religious volunteers who are approved may go into the dayroom and provide ministry in general population areas to those inmates who wish to participate.

9. Religious volunteers may also make use of the multi-purpose area in order to hold religious services.

10. Inmates in administrative segregation may receive ministry individually only.

11. Detention Center officials may end or limit a ministry session or limit the number of religious volunteers if necessary.

12. Religious services may be scheduled for a set time each week. Other services may be scheduled for other times with the Chief Deputy Sheriff's approval. Normally, there are religious services held on Wednesdays and Sundays. Inmates have the opportunity to request an individual religious visit for any Wednesday by filling out a request form and turning it in to any officer. I do not ever recall the Plaintiff requesting to see Pastor James Benson, nor do I recall denying any such request. Had the Plaintiff submitted a request for an individual religious visit, I would have answered the request and placed a copy of the request form in the Plaintiff's inmate file.

13. No inmate who, in the opinion of the Sheriff, Chief Deputy Sheriff, or Shift Supervisor, presents a security risk may attend religious services. Such inmates will be allowed free access to religious counseling or conferences on an individual basis.

14. No member of the Detention Center staff may discriminate against any inmate on

the basis on that inmate's choice of religion.

15. The Lee County Sheriff's Department will not provide any religious materials of any nature to inmates at Sheriff's Department's expense.

16. It is the policy of the Lee County Sheriff's Department that no person be incarcerated in a situation within the Lee County Detention Center where his life or health may be threatened by another inmate when, by making the situation known to members of the Detention Center staff, he can be incarcerated elsewhere.

17. All persons being booked into the Lee County Detention Center are given the opportunity to complete an Enemies List.

18. The Booking Officer gives the arrestee an opportunity to make known in writing any person within the Detention Center whom he fears or has reason to believe is a threat to him in any way.

19. If the inmate states that there is an inmate or inmates that would do him harm, Detention Center personnel will list the inmate or inmates on the Enemies List form stating the reason the new inmate feels that he is in danger.

20. Whenever such a situation occurs, the Shift Supervisor will be notified and the new inmate will be housed away from those who he fears will cause him harm.

21. At the time the Plaintiff was booked into the Lee County Detention Facility, the Booking Officer was required to note on the booking sheet whether or not a new inmate stated that he has knowledge of any other inmate who would cause him harm.

22. The date that the Plaintiff was involved in a fight with Derode Woods was June 5, 2004. June 5, 2004, fell on a Saturday, and therefore I was not on duty that day. The knowledge that I have concerning this incident is gleaned from the reports attached to the affidavits of Sergeant Tabb and Corporal Cowhick.

23. Prior to the altercation on June 5, 2004, the Plaintiff had never asked to be separated from Derode Woods. Had the Plaintiff requested to be separated from Derode Woods, I or any other officer would have done so in accordance with the policy of the Lee County Detention Center.

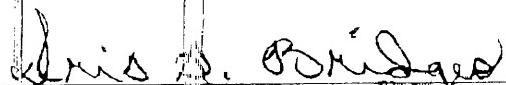
24. Internal grievance procedures at the Lee County Detention Facility are available to all inmates. It is the policy of the Lee County Sheriff's Department that inmates are permitted to submit grievances and that each grievance will be acted upon. Upon request, the inmates are given an Inmate Grievance Form to complete and return to a Lee County Detention Facility staff member for any grievances they may have. If a grievance is filed, it is acted upon accordingly, (that is, whether an investigation was needed or simply a response made to the complaints).

25. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.

26. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation.

  
RAY ROBERSON

SWORN TO and SUBSCRIBED before me this 27 day of January, 2006.

  
Kris D. Bridges  
NOTARY PUBLIC  
My Commission Expires: \_\_\_\_\_

**Exhibit E**  
**Affidavit of Joseph Matterson Cowhick**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

EDDIE L. FOREMAN, JR., )  
                            )  
Plaintiff,               )  
                            )  
v.                         ) Civil Action No. 3:05-CV-1134-WKW  
                            )  
SHERIFF JAY JONES, et.al., )  
                            )  
Defendant.               )

**AFFIDAVIT OF JOSEPH MATTERSON COWHICK**

STATE OF ALABAMA           )  
                            )  
COUNTY OF LEE               )

**BEFORE ME**, the undersigned authority and Notary Public in and for said County and State at large, personally appeared Joseph Matterson Cowhick, who being known to me and being by me first duly sworn on oath deposes and says as follows:

1.       My name is Joseph Matterson Cowhick. I am over the age of nineteen and competent to execute this affidavit.
2.       I have been employed as a corrections officer with the Lee County Sheriff's Department for 6 years and have obtained the rank of corporal.
3.       I am familiar with the Plaintiff, Eddie L. Foreman, Jr., due to his incarceration in the Lee County Detention Facility.
4.       I state affirmatively that I neither acted, nor caused anyone to act, in such a manner as to deprive the Plaintiff of any right to which he was entitled.
5.       On June 5, 2004, at approximately 4:30 p.m., the buzzer was activated in Cell F-4. I was informed that a fight had broken out in cell F-4 between inmates Marquez Vaughn, Derode Woods, Antonio Edwards, and Eddie Foreman. Inmate Derode Woods was on the

floor of the cell and was obviously injured. Therefore was he taken to the Nurse and then brought to booking for observation. See Exhibit 1 attached hereto, Inmate File of Eddie Foreman, "Inmate File," Lee County Sheriff's Department Special Report dated June 5, 2004.

6. At that time, I did not see the Plaintiff because he was in the shower.

7. However, about thirty minutes later, the buzzer in F-4 went off again. When I arrived at F-4, I saw inmate Eddie Foreman on the floor with a deep cut above his right eye. I escorted Foreman to see Nurse Stewart, the Jail Nurse. Nurse Stewart recommended that Foreman be taken to the hospital for stitches. Therefore, Corporal Wiltsie transported Foreman to the hospital. See Ex. 1.

8. I interviewed the Plaintiff while he was at the Nurse's Station. The Plaintiff told me and Nurse Stewart that he fell out of the shower and hit his head. He said that he then got back up in the shower and put some grease on his hair. Per the Plaintiff, after that he went and sat down at the table and began feeling light-headed. He then fell to the floor feeling faint. The Plaintiff stated that it was at that point that the officers came in and that I took him to the Nurse's Station. See Ex. 1; see also Exhibit 2 attached hereto, Inmate File, Lee County Sheriff's Department Jail Division Inmate Interview Record.

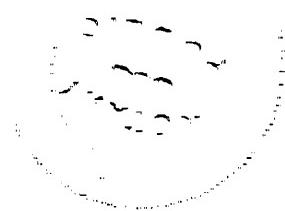
9. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.

10. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation.

*Joseph M. Cowhick*  
JOSEPH MATTERSON COWHICK

SWORN TO and SUBSCRIBED before me this 26 day of January, 2006.

*Doris D. Bridges*  
NOTARY PUBLIC  
My Commission Expires: NOVEMBER 10, 2007



**EXHIBIT 1  
Inmate File  
Lee County Sheriff's Department Special  
Report  
Dated June 5, 2004**

LEE COUNTY SHERIFF'S DEPARTMENT  
SPECIAL REPORT

Subject: Inmate FIGHT Opelika, Ala., June 5, 2004

To the Sheriff of Lee County:

I report the following Inmate FIGHT which occurred at 16:30 o'clock  
 this P M., at LCDC Cell F-4

Below give full-particulars, together with name of principals and witnesses and their address.

ON June 5<sup>th</sup> 2004 Around 16:30 A FIGHT BROKE OUT IN F-4 BETWEEN INMATE MARQUEZ VAUGHN, DERODE WOODS, ANTONIO EDWARDS AND EDDIE FOREMAN.  
I Sgt. Cowhick Had Just Relieved OFC Griggs IN Booking So OFC Griggs Could Feed "C" Wings.  
OFC Griggs Soon Came To Booking So Sgt. Cowhick Could Resume Duties In The Back. Inm Derode Woods Was Brought To Booking For OBSERVATION  
(After He Had Been TAKEN TO THE NURSE) NO OTHER INMATE WAS TAKEN TO THE NURSE AT THAT TIME.  
About 17:00 F-4 Buzzer WENT OFF AGAIN. ALL BLUE TEAM DAY OFFICERS AND Sgt. TASS WENT TO F-4  
Inm Eddie Foreman Was On The Floor WITH A Deep Cut Above His Right Eye. Sgt. Cowhick Escorted Inm Foreman To See The Nurse.  
AFTER SEVERAL ATTEMPTS TO DO THE BUTTERFLY STITCHES, NURSE STEWART INFORMED Cpl Cowhick TO TAKE

Reported by \_\_\_\_\_

Address \_\_\_\_\_ Phone \_\_\_\_\_

Complaint Received by \_\_\_\_\_ How \_\_\_\_\_

LEE COUNTY SHERIFF'S DEPARTMENT  
SPECIAL REPORT

Subject INMATE FIGHT Opelika, Ala., June 5, 2004

To the Sheriff of Lee County:

I report the following INMATE FIGHT which occurred at 16:30 o'clock  
this P M., at L CPC CELL F-4

Below give full-particulars, together with name of principals and witnesses and their address.

Him To The Hospital For STICKS. Col Wilisse SAID,  
"He Would TAKE I'M Foreman." Col Cowdick Interviewed  
I'M Foreman (ATTACHED) AND Sgt. TABB Interviewed  
I'M Woods, AFTER BOTH Interviews were Done, Sgt.  
TABB ORDER FOR BOTH Shifts To Lockdown I'M  
MARQUEZ VAUGHN, BOTH Blue Team Shifts WENT  
To F-4 AND Locked Down MARQUEZ VAUGHN E-6  
Sgt. TABB TOOK Pictures OF I'M Deonle Woods  
(Wounds AND Bite MARKS FROM THE INCIDENT,

Reported by \_\_\_\_\_

Address \_\_\_\_\_ Phone \_\_\_\_\_

Complaint Received by \_\_\_\_\_ How \_\_\_\_\_

**EXHIBIT 2**  
**Inmate File**  
**Lee County Sheriff's Department**  
**Jail Division Inmate Interview Record**

**LEE COUNTY SHERIFF'S DEPARTMENT  
JAIL DIVISION  
INMATE INTERVIEW RECORD**

(Form #27)

<i>Foreman</i>	<i>Eddie</i>		<i>B</i>	<i>M</i>		
Name: Last	First	Middle	Serial #	Race	Sex	DOB: M/D/Y

**USE OF FORM:** Each interview summary should contain the following material as appropriate: recommendation made by jailer; decisions made by inmate; progress noted or other observations of jailer. Each entry must be dated and signed by the jailer. Use additional copies of this form if more space is needed.

DATE OF ENTRY	SUMMARY OF INTERVIEW	SIGNATURE OF JAILER